UNITED STATES BANKRUPTCY COURT

| SOUTHERN DISTRICT OF NEW YORK | v | |
|---|---------------|-----------------------------|
| In re: | A : | Chapter 11 |
| | : | Case No. 08-13555 (SCC) |
| LEHMAN BROTHERS HOLDINGS INC., et al., | : | |
| | : | |
| | : | |
| Debtors. | : | |
| | X | |
| LEHMAN BROTHERS HOLDINGS INC., LEHMAN | : | Ad. Pro. No. 12-01044 (SCC) |
| BROTHERS SPECIAL FINANCING INC., LEHMAN | : | |
| BROTHERS COMMODITY SERVICES INC., LEHMAN | : | |
| BROTHERS COMMERCIAL CORP., and | : | |
| OFFICIAL COMMITTEE OF UNSECURED | : | |
| CREDITORS OF LEHMAN BROTHERS HOLDINGS | : | |
| INC., | : | |
| Plaintiffs and | : | |
| Plaintiff Intervenor, | : | |
| | : | |
| -against- | : | |
| | : | |
| | : | |
| CITIBANK, N.A., CITIGROUP GLOBAL MARKETS | : | |
| LTD., CITIGROUP FINANCIAL PRODUCTS INC., | : | |
| CITIGROUP ENERGY INC., CITI CANYON LTD., and | : | |
| CITI SWAPCO INC., FYI LTD., FFI FUND LTD., and: | : | |
| OLIFANT FUND, LTD., | : | |
| Defendants and | : | |
| Defendant Intervenors. | : | |
| | X | |

STIPULATION AND SCHEDULING ORDER FOR PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

IT IS HEREBY STIPULATED AND AGREED, by the parties Lehman Brothers
Holdings Inc., Lehman Brothers Special Financing Inc., Lehman Brothers Commodity Services
Inc., Lehman Brothers Commercial Corp., and the Official Committee of Unsecured Creditors of
Lehman Brothers Holdings Inc. (collectively, "Plaintiffs") and Citibank, N.A., Citigroup Global
Markets Ltd., Citigroup Financial Products Inc., Citigroup Energy Inc., Citi Canyon Ltd., and
Citi Swapco Inc. (collectively, "Defendants"), through the undersigned counsel, subject to the
approval of the Court, that the following schedule shall govern briefing on Plaintiffs' motion for

partial summary judgment on the issue of Defendants' asserted right to post-petition interest, fees, and costs (the "Motion").

- 1. Plaintiffs shall file the Motion (and any accompanying brief) with the Court on any date after June 1, 2014.
- Defendants shall file their response to the Motion no later than 45 days from the date the Motion is filed.
- 3. Plaintiffs shall file any reply in further support of the Motion no later than 30 days from the date of Defendants' response.

Dated: May 21, 2014 New York, New York

CURTIS, MALLET-PREVOST, COLT & MOSLE, LLP

By: <u>/s/ Peter J. Behmke</u> Lynn Harrison 3rd Peter J. Behmke

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Counsel for Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., et al.

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Counsel for Citibank, N.A., Citigroup, Global Markets Ltd., Citigroup, Financial Products Inc., Citigroup Energy Inc., Citi Canyon Ltd., and Citi Swapco Inc.

IT IS SO-ORDERED:

May 23, 2014 New York, New York

/s/ Shelley C. Chapman
HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE